

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
SHELDON G. ADELSON,	)	
Plaintiff	)	
	)	
v.	)	C. A. NO.: 04-cv-10357-RCL
	)	
MOSHE HANANEL,	)	
Defendant	)	
_____	)	

**PLAINTIFF, SHELDON G. ADELSON'S, RESPONSES TO DEFENDANT, MOSHE  
HANANEL'S, FIRST REQUEST TO ADELSON FOR :PRODUCTION OF  
DOCUMENTS AND THINGS CONCERNING JURISDICTION**

**REQUEST NO. 1**

All aircraft flight manifests concerning travel by Adelson from June 1, 1995 to the present:

- a. to or from Israel;
- b. to or from Jordan; and
- c. to or from Massachusetts.

**RESPONSE NO. 1**

Plaintiff objects to this request as the term "aircraft flight manifests" is not defined. Without waiving that objection plaintiff will produce documents which list travel by plaintiff to or from the places listed in the request for the appropriate time period. Such documents are produced herewith.

**REQUEST NO. 2**

All documents concerning business, social, or other activities by Adelson in Israel from June 1, 1995 to January 1, 1996.

**RESPONSE NO. 2**

Plaintiff objects to this request as it is so broad as compliance is not possible. Without waiving that request plaintiff will produce such documents as have been found which reasonably respond. Such documents are produced herewith.

**REQUEST NO. 3**

Documents Adelson intends to present to the Court in support of his allegations of personal jurisdiction over Hananel in this action.

**RESPONSE NO. 3**

Plaintiff does not now know what documents in addition to those produced herewith, if any, he will present to the court. When such decision is made those documents will be produced.

**REQUEST NO. 4**

All documents concerning business, social or other activities by Hananel from June 1, 1995 to January 1, 1996, including, but not limited to, the diary kept in IPI's Israel office by a person named "Daisy" (or similar).

**RESPONSE NO. 4**

There was/is no person named "Daisy" in the IPI Israel office. No "diary" is known to exist other than within the documents removed from the IPI office by Hananel. Such other documents as exist and within plaintiff's possession and control are produced herewith.

**REQUEST NO. 5**

Documents concerning the ownership or rental of real estate in Adelson's name or in the name of his immediate family members at 10 Paamoni Street, Tel Aviv, a villa in Haifa, and other properties purchased after 1991, including but not limited to deeds, closing papers, and tax bills and payments.

**RESPONSE NO. 5**

Plaintiff has no such documents within his possession and control.

**REQUEST NO. 6**

Documents concerning Adelson's or any immediate family member's (such as wife or daughter) ownership of motor vehicles in Israel.

**RESPONSE NO. 6**

Plaintiff objects to this request as the documents requested are absolutely irrelevant to the issues in this case nor will the production lead to relevant information.